

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANDREA L. VAN VORST, KENNETH
MAHNKEN, YVETTE SOTO, and
MARTIN J. WEINER,

Plaintiffs,

v.

LUTHERAN HEALTHCARE d/b/a
LUTHERAN MEDICAL CENTER,

Defendant.

No. 15-cv-1667 (LDH) (PK)

**PLAINTIFFS' PROPOSED
VOIR DIRE QUESTIONS**

1. Are any of you familiar with the Plaintiffs: Andrea L. Van Vorst, Kenneth Mahnken, Yvette Soto, and Martin J. Weiner?
2. Do you or anyone you know have an affiliation with New York University Langone Hospital, which was formerly known as the Lutheran Medical Center?
 - a. If so, has your experience or conversations with others influenced your views of Lutheran Medical Center? If yes, please explain.
3. Do any of you know the lawyers for the Plaintiffs?
4. Do any of you know the lawyers for Lutheran Medical Center?
5. In this case, there is a claim that a hospital failed to provide effective means of communication for deaf patients. Do any of you think that a plaintiff should only be able to sue if she can show some sort of physical injury or monetary loss that can be proven with dollars and cents?
6. Are you or anyone you know deaf or hard of hearing?
7. Are any of you familiar with American Sign Language?
8. Do you or anyone you know have a disability that affects speech or communication?
9. Have you ever played a role in receiving a request for an accommodation from persons with disabilities?
10. Have you or anyone you know ever been discriminated against?

11. Do any of you run your own business?
 - a. If so, do you need to accommodate prospective customers based on their disability?
12. Have you or anyone you know worked at a hospital or a doctor's office?
 - a. If so, has your experience or conversations with others influenced your view on patients who have complaints? If yes, please explain.
13. Do any of you think that disability laws have become too burdensome? In other words, you believe that providing accommodations to people with disabilities has gone too far in either businesses or hospitals.
 - a. If yes, please provide an example of what you think is "too burdensome."
14. Do any of you have a negative opinion of a person who decides to bring a lawsuit as a way to solve a disagreement?
15. Do any of you believe that lawsuits are a waste of time and resources?
16. Have any of you heard of someone who made up a story to bring a lawsuit just so they could get benefits?
17. What do you do with your free time?
18. Which television shows do you usually watch?
19. Which newspapers do you usually read?
20. Do you have any difficulty reading, speaking, or understanding English?
21. Do any of you think that you will be unable to sit for long periods of time because of physical issues or anything else?
22. Do any of you think that you cannot be impartial in deciding this case?

Dated: January 4, 2019

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